

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)	CRIMINAL CASE NO.
)	
v.)	2:23-CR-012
)	
PATRICK JOHN AGNEW,)	
Defendant.)	

**CONSENT MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL
MOTIONS**

COMES NOW, the Petitioner above-named, by and through undersigned counsel, and files this his Motion for Extension of Time to File Pretrial Motions in the above-captioned matter. In support thereof, Petitioner shows as follows:

1. The Petitioner's Pretrial Motions are currently due on or before December 11, 2023 in the above-captioned matter.
2. Undersigned is lead counsel for the Defendant in *State of Georgia v. Quamarvious Nichols*, Case No. **22SC183572**, in which trial commenced on January 4, 2023, at 9:00 a.m., before Judge Glanville, in the Fulton County Superior Court. This is a RICO case with multiple defendants. The trial is anticipated to last up to a year.
3. Counsel requested the approval of Jennifer Keene, Assistant United States Attorney, who is unopposed to this motion.

4. Co-Counsel Jeff Talley is available to appear at the Pretrial Conference scheduled for December 13, 2023 if the Court wishes.

WHEREFORE, based upon the foregoing, the undersigned requests that the Court enter an Order granting this motion and allow him an additional forty five (45) day extension from December 11, 2023 to file Pretrial Motions.

This 11 day of December 2023.

Respectfully submitted,

/s/ Bruce S. Harvey
LAW OFFICE OF BRUCE S. HARVEY
ATTORNEY FOR PETITIONER
Bruce S. Harvey, #335175
bruce@bharveylawfirm.com
146 Nassau Street, NW
Atlanta, Georgia 30303
(404) 659-4628